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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

US RIGHT TO KNOW,
Plaintiff,

v.

UNITED STATES DEFENSE
INTELLIGENCE AGENCY,
Defendant.

CASE NO. 23-cv-2936-TSH

**STIPULATION AND [PROPOSED] ORDER RE
CASE MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES**

Plaintiff, US Right to Know (“Plaintiff” or “USRTK”) and Defendant, the United States Defense Intelligence Agency, submit this stipulation pursuant to Local Civil Rule 6-2 to continue the initial case management conference and associated deadlines from September 14, 2023 to October 26, 2023 at 10:00 a.m.

STIPULATION

WHEREAS, Plaintiff, US Right to Know filed a Freedom of Information Act (“FOIA”) complaint on June 14, 2023. ECF No. 1.

WHEREAS, the Defendant, United States Defense Intelligence Agency (“DIA” or “the Agency”), provided a final response to Plaintiff’s FOIA request on August 22, 2023 and an amended final response on August 23, 2023. On August 23, 2023, the Agency filed a response to the Complaint and a corrected

1 answer on August 24, 2023. ECF Nos. 23, 24.

2 WHEREAS, the parties are working together cooperatively in this case and Plaintiff informed
3 Defendant on August 29, 2023 that it has not had sufficient time to review the Agency's final response. As
4 such, this continuance will provide Plaintiff with the additional time necessary to review the Agency's
5 final response and to determine whether there are any disputes remaining. If so, this continuance will also
6 provide the parties with the necessary time to discuss any remaining issues without the need for judicial
7 intervention.

8 WHEREAS, the requested continuance is not expected to have any adverse impact on the schedule
9 for the case and serves the judicial economy by allowing the parties additional time to attempt to resolve
10 this matter without the need for further judicial intervention,

11 AS SUCH, it is hereby stipulate by and between the parties, through the undersigned counsel that
12 the initial case management conference, along with the associated deadlines is continued from September
13 14, 2023 to October 26, 2023 at 10:00 a.m.

14 DATED: August 30, 2023

ISMAIL J. RAMSEY
United States Attorney

15
16 /s/ Valerie E. Smith*
VALERIE E. SMITH
Assistant United States Attorney

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18 Attorneys for the Federal Defendant

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20 /s/ Daniel C. Snyder
DANIEL C. SNYDER

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22 /s/ Lily Anne Rivo
LILY ANNE RIVO
GREENFIRE LAW, PC

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24 Attorneys for Plaintiff

25 **In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury
26 that all signatories have concurred in the filing of this document.*
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[PROPOSED] ORDER

Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY ORDERED that the case management conference currently scheduled for September 14, 2023 at 10:00 a.m. is continued to _____. A case management statement shall be filed seven days before the case management conference.

IT IS SO ORDERED.

Date: _____

THE HON. THOMAS S. HIXSON
UNITED STATES MAGISTRATE JUDGE